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12 Attorneys for Defendant
CITY AND COUNTY OF SAN FRANCISCO
13

14
15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA

17 HASTINGS COLLEGE OF THE LAW, a
public trust and institution of higher education
duly organized under the laws and the
Constitution of the State of California;
FALLON VICTORIA, an individual; RENE
DENIS, an individual; TENDERLOIN
MERCHANTS AND PROPERTY
ASSOCIATION, a business association;
RANDY HUGHES, an individual; and
KRISTEN VILLALOBOS, an individual,

22 Plaintiffs,

23 vs.

24 CITY AND COUNTY OF SAN
FRANCISCO, a municipal entity,
25

Defendant.

Case No. 4:20-cv-3033 JST

**DECLARATION OF RYAN STEVENS IN
SUPPORT OF ADMINISTRATIVE MOTION
TO RELATE CASES**

Trial Date: Not Set

1 I, Ryan Stevens, declare as follows:

2 1. I am a Deputy City Attorney for the City and County of San Francisco. The facts set
3 forth in this declaration are stated on my own personal knowledge or, as specified, upon my
4 information and belief based on official acts and writings.

5 2. Attached to this declaration as Exhibit A is a copy of the complaint *Daniel Giosso,*
6 *James Giosso, and Richard Giosso, Trustees of the Giosso Children's Trust; Mike O'Neill and Sons, a*
7 *California General Partnership*, 3:20-cv-04255-TSH. Attached as Exhibit B is a copy of the
8 complaint *Erin Maher, Jason Reindorp, Nick Medina, Monica Calmer, South of Market Business*
9 *Association, 570 Jessie LLC, Sierrec LLC dba Montesacro Pinserie Romana, Megali Souvla Inc, dbd*
10 *Souvla, Design Like Whoa LLC v. City and County of San Francisco*, 4:20-cv-04771-KAW
11 ("Maher").

12 3. I emailed Matthew Davis, counsel for the Plaintiffs in the *Hastings* action, to ask
13 whether Plaintiffs in that action would oppose relation of either action. Mr. Davis responded that
14 Plaintiffs did not oppose relation of either action.

15 4. I emailed counsel for the interveners to ask whether Intervenors would oppose relation
16 of either action. Counsel for Intervenors, Tiffany Nocon, responded that they did not oppose relation
17 in either action.

18 5. On July 10, 2020, I emailed counsel of record, Curtis Dowling, in the *Giosso* action to
19 ask whether Plaintiffs in that action would oppose relation, but as of the filing of this motion have not
20 received a response to that email.

21 6. On July 24, 2020, I emailed counsel of record, Andrew Zacks, in the *Maher* action to
22 ask whether Plaintiffs in that action would oppose relation, but as of the filing of this motion have not
23 received a response to that email.

24 I declare under penalty of perjury under the laws of the State of California that the foregoing is
25 true and correct. Executed on September 17, 2020 at San Francisco, California.
26

27 _____
28 RYAN STEVENS

PROOF OF SERVICE

I, ANNAMARIE DAVIS, declare as follows:

I am a citizen of the United States, over the age of eighteen years and not a party to the above-entitled action. I am employed at the City Attorney's Office of San Francisco, Fox Plaza Building, 1390 Market Street, Sixth Floor, San Francisco, CA 94102.

On September 17, 2020, I served the following document(s):

**ADMINISTRATIVE MOTION TO CONSIDER WHETHER CASES SHOULD BE RELATED
PURSUANT TO CIVIL LOCAL RULE 3-12**

on the following persons at the locations specified:

Michael A. Kelly, Esq.
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Matthew D. Davis, Esq.
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8 Curtis F. Dowling, Esq.
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13 Attorneys for Plaintiff

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16 in the manner indicated below:

17 **BY ELECTRONIC MAIL:** Based on a court order or an agreement of the parties to accept electronic
18 service, I caused the documents to be sent to the person(s) at the electronic service address(es) listed above. Such
19 document(s) were transmitted *via* electronic mail from the electronic address: annamarie.davis@sfcityatty.org in
20 portable document format ("PDF") Adobe Acrobat.

21 I declare under penalty of perjury pursuant to the laws of the State of California that the
22 foregoing is true and correct.

23 Executed September 17, 2020, at San Francisco, California.



24 ANNAMARIE DAVIS